

EXHIBIT 39

From: [Murphy, Michael D.](#)
To: [Beral, Arash](#); [Malynn, Todd M.](#)
Cc: [Zollicoffer, Jordan](#); [James, Pauletta](#)
Subject: Meet and Confer items
Date: Thursday, March 20, 2025 3:03:32 PM

Arash and Todd:

1. **Pleading Challenges: Please advise today** as to three times you can meet and confer with Jordan and I regarding a Rule 12 Motion and Motion for Judgment on the Pleadings on behalf of SPAVI, SPAVI US, Cinco, and the Singapore entity. The Motion will be challenging each of the causes of action in the Third Party Complaint / Counterclaim under 12(b)(6) and for failing under Iqbal and Twombly. As for SPAVI we will also be challenging a host of your affirmative defenses and seeking to have them dismissed as well. When you propose dates and times, please keep in mind that once you send us the subpoenas / or we agree to waive service, we only have 12 days to file and our LR 7-3 meet and confer has to be within time sufficient to accomplish that. I can be available tomorrow afternoon. I would prefer it be before 1, because Jordan is on the East Coast.
2. **Trial Schedule:** Rather than us going back and forth as to who was supposed to propose a schedule, given that this was first asked of us by you in December, we propose the below schedule, which I think I can get buy in on with respect to Cinco as well as the additional SPAVI parties you named. We are giving up a lot with respect to time for Cinco's role, as a courtesy. I cannot guarantee its agreement but lets all of us come to an agreement and then I will work with them. We would like to also include in here that for any deadlines that passed, that deadline is extended as if it did not yet toll. This avoids anyone playing games with respect to meeting and conferring as to outstanding discovery (both of us could do so, so let's nip it in the bud). If we can agree on this over the next 24 hours, I will obtain a waiver of service. **Please respond to this proposed schedule by noon tomorrow.**
3. **Contempt Damages:** Regarding fees in contempt, I owe you some additional backup here. I have not had the time to sit down and get you revised redactions showing that we in fact did reduce Kenny's time in each entry where other tasks were identified. I would like to ask the Court for an extra week. **Please confirm this is acceptable.**
4. **Meet and Confer on Discovery:** I noted your letter last Friday. I would like us to complete the meet and confer as to the pleading challenges first, and then we can address document productions, responses, on all sides. I believe an in person meet and confer is advisable. Please note: our production with respect to what was discussed at the IDC got delayed because of things out of my control. We would like to propose the dates on that be extended by 10 days as to each.

Thank you,

Trial <input type="checkbox"/> Court <input type="checkbox"/> Jury (Mon., 8:30 a.m.)	August 4, 2025 January 5, 2026
Pretrial Conference (Fri., 9:30 a.m.) (including hearing on motions in limine)	July 18, 2025 December 19, 2025
Deadline to Complete Rule 26 Disclosures or Amended Disclosures	April 16, 2025
Motion to Amend Pleadings/Add Parties	November 8, 2024 April 30, 2025

(Hearing Deadline)	
Discovery Deadline - Nonexpert	March 14, 2025 August 15, 2025
Discovery Deadline – Expert	April 11, 2025 September 11, 2025
Initial Expert Disclosure	February 28, 2025 August 1, 2025
Rebuttal Expert Disclosure	March 14, 2025 August 15, 2025
Discovery Motion Hearing Deadline ^[1]	April 11, 2025 September 11, 2025
Non-Discovery Motion Hearing Deadline	April 25, 2025 September 26, 2025
Settlement Conference Deadline <input type="checkbox"/> 1. Mag. J. <input type="checkbox"/> 2. Panel <input type="checkbox"/> 3. Private	May 9, 2025 October 10, 2025
Post-Settlement Status Conf. (Fri., 8:30 a.m.):	May 23, 2025 October 24, 2025
Joint Status Report Due (7 days before <i>by 9:00 a.m.</i>):	May 16, 2025 October 17, 2025
Trial Filings (First Set) Deadline	June 20, 2025 November 21, 2025
Trial Filings (Second Set) Deadline	July 7, 2025 December 8, 2025

^[1] A motion seeking or opposing further nonexpert discovery must be heard on or before the nonexpert discovery deadline.